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January 24, 2020

## Via ECF

The Honorable Ronnie Abrams, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, New York 10007

Re: LAWRENCE YOUNG, ON BEHALF OF HIMSELF AND ALL OTHER

PERSONS SIMILARLY SITUATED V. ARGOS INN, INC.,

Docket No.: 19-cv-9240-RA

Dear Judge Abrams:

This firm represents the Defendant in this matter. We have just been retained today in this action and, pursuant to your Honor's Individual Rule 1(d) respectfully move for a) an extension of time to answer, move or otherwise appear with regard to the Complaint filed in this action until March 9, 2020; and b) to adjourn the Initial Conference set for January 31, 2020 at 1:45 p.m. to a date beyond March 9, 2020, or to any date convenient to the Court.

Defendant is making this letter motion because we have just recently been retained in this matter, a highly technical A.D.A. claim and must be brought up to speed on the nuances of the case. In addition, we have initiated settlement discussions with the Plaintiff's Attorney, Darryn G. Solotoff, Esq.

We have the consent of Attorney Solotoff for both of these applications.

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This is the first request for either application. If this request is granted, the adjournment will not affect any other dates or deadlines.

Thank you for permitting me to address the Court in this matter.

Respectfully submitted,

Daniel J. Solinsky

DJS

CC: Via ECF

Law Office of Darryn G. Solotoff

Attorneys for Plaintiff

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Application granted. Defendant shall respond to the Complaint no later than March 9, 2020. The initial conference scheduled for January 31, 2020 is hereby adjourned to April 3, 2020 at 2:30 p.m. If a referral to Magistrate Judge Gorenstein or the Court's mediation program would be productive prior to the conference, the parties should jointly file a letter with the Court requesting a referral.

SO ORDERED.

Hon. Ronnie Abrams

1/27/2020